



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

US EPA RECORDS CENTER REGION 5



546584

September 28, 2016

Ms. Shari Kolak  
Remedial Project Manager  
U.S. EPA Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Re: Troy Well Field Unknown Source  
Remediation Response  
Correspondence  
Remedial Response  
Miami County  
555001353004

**Subject: Ohio EPA Request for Administrative Discussion on Changes to RI/FS Approach, East Troy Contaminated Aquifer Site, Troy, Miami County**

Dear Ms. Kolak:

In September 2015, the United States Environmental Protection Agency (USEPA) indicated that issues had arisen regarding the scope of work for the East Troy Contaminated Aquifer (ETCA) Superfund Site located in Troy, Miami County, Ohio (the Site). Since that time, Ohio EPA and USEPA have been working to determine a clear path forward to evaluate remedial actions to address the complete exposure pathways at the Site. Technical discussions were held and correspondence was exchanged to clarify changes to the approach for evaluating remedial actions as well as computing appropriate cleanup numbers.

These events included:

- An August 21, 2015 letter from Ohio EPA outlining comments on the Draft Feasibility Study (FS);
- Electronic correspondence from September through October of 2015 between Ohio EPA and USEPA focusing on source area soil cleanup requirements;
- Electronic correspondence from November 2015 through January 2016 between Ohio EPA and USEPA focusing on technical components of an interim remedial action approach for soil and ground water source areas;
- A February 5, 2016 letter from Ohio EPA outlining concerns regarding USEPA's proposed interim action and focused feasibility study (FFS) approach;
- A March 2, 2016 face-to-face meeting between Ohio EPA and USEPA to discuss components of an interim remedial action;
- An April 18, 2016 letter from Ohio EPA outlining comments on the Summary of Proposed Remedial Action Objectives for Focused Feasibility Study;
- A May 3, 2016 letter from Ohio EPA outlining comments on the Summary of Proposed Remedial Action Objectives for FFS;

- A May 5, 2016 conference call between Ohio EPA and USEPA to discuss the May 3, 2016 comment letter;
- An email on May 25, 2016 by USEPA which provided input values for site-specific soil leaching calculations for the proposed FFS; and
- A July 11, 2016 letter from Ohio EPA providing comments from our review of the site-specific soil leaching calculations.

On July 11, 2016, in an effort to determine long-term financial obligations at fund-lead Superfund sites, Ohio EPA provided to USEPA a summary questionnaire requesting input from USEPA on submittal timelines and anticipated remedial costs. On July 20, 2016, Ohio EPA and USEPA discussed via a phone call the cost-share requirements of remedies implemented under an interim remedial action. USEPA indicated that the interim remedial actions required a 10% payment of the capital (construction) costs, a 10% payment of operation and maintenance (O&M) costs during the 10-year Long-Term Remedial Action (LTRA) period, and 100% responsibility for O&M costs post-LTRA. Additionally, USEPA would be seeking Ohio EPA concurrence on the Interim Record of Decision (I-ROD), and also on a future Superfund State Contract (SSC).

Recently, USEPA informed Ohio EPA that they intend to begin drafting the FFS in early October. As a follow up, Ohio EPA Southwest District and Central Office staff and management discussed the site last week. With regard to our previous evaluation of the site conditions and discussions with you, we note that USEPA's initially proposed remedial alternative involves a technology that appears unlikely to achieve remedial objectives, especially within a reasonable time frame, given its unsuccessful application at other nearby sites having similar soil, geological and hydrogeological conditions. Also, the majority of the total costs for the remedial alternative we discussed initially appear to be associated with O&M activities. Further, monitored natural attenuation (MNA) has been referenced by USEPA as a possible second stage of the future remedial action. However, historical groundwater sampling and analytical data do not appear to support MNA. Because of these factors, and that Ohio EPA would need to finance 10% of the capital and LTRA costs, and ultimately 100% of the O&M costs, Ohio EPA is requesting a face-to-face meeting in Columbus with you and your management to discuss the following:

1. Further clarification is needed regarding the use of the interim remedial action approach versus a non-time-critical removal through the development of an Engineering Evaluation/Cost Analysis (EE/CA). The use of the interim remedial action and FFS approach is a significant deviation from the previously proposed site-wide FS and a clear reasoning for the need for an interim remedial action has not been provided. Helpful information would include a summary of the cost differences of an interim remedial action approach over a removal action or traditional, comprehensive FS and the expected effectiveness of an interim remedial action over a removal action or traditional, comprehensive FS.




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2. Since Ohio EPA's review of the Draft FS (July 7, 2015), USEPA has made significant changes to the remedial approach. It is not clear what exposure pathways will be remediated under the interim remedial action and the final remedial action. Ohio EPA is requesting that USEPA provide a final, comprehensive outline for the pathways that will be addressed under the interim remedial action and the final remedial action.
3. If the previously discussed remedial alternative is to be recommended in a future I-ROD, a pilot test would be beneficial (from both human health and cost perspectives) to gauge whether the remedial alternative is capable of achieving success in the future, and in a reasonable time frame. In addition, a re-evaluation of the potential for MNA would also be of value.

Please contact me at (937) 285-6456 or [Madelyn.Adams@epa.ohio.gov](mailto:Madelyn.Adams@epa.ohio.gov) at your earliest convenience to set up this meeting.

Sincerely,



Madelyn Adams  
Site Coordinator  
Division of Environmental Response and Revitalization

cc: Timothy Fischer, USEPA  
Mike Proffitt, Chief, DERR  
Mike Starkey, Manager, DERR SWDO  
Mark Rickrich, ARCA Manager, DERR CO